

American Chemical Service, Inc.

P.O. Box 190 • Griffith, Indiana 46319
(219) 924-4370 • Chicago Phone (312) 768-3400

15

EPA Region 5 Records Ctr.



205265

August 28, 1992

Ms. Karen Martin (P-19J)
Community Relations Coordinator
United States Environmental Protection Agency
77 West Jackson
Chicago, IL 60604

Re: Comments to Proposed Plan for Remedial Action
American Chemical Service Superfund Site
Griffith, Indiana, June 1992

Dear Ms. Martin:

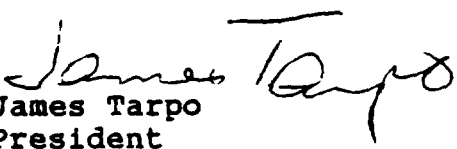
American Chemical Service, Inc. is concerned with the dangers and hazards involved in performing alternative number six because of the nature of the materials, including cyanide and VOC's, buried in the off-site containment area. It is our opinion that the implementation of alternative number six (excavation and low temperature thermal treatment) may result in an increased and immediate risk to humans and the environment. If alternative number six is selected as a remedy for any portion of the site, American Chemical Service has serious doubts whether the protection and welfare of surrounding residents and its employees can be guaranteed. Without the necessary guarantees, American Chemical Services would be reluctant to grant voluntary access on its property for the purpose of performing remedial activities thereon.

With respect to the belief that the significance of intact drums containing nonreclaimable waste are buried in the off-site containment area, American Chemical Service notes that it was the general practice of an independent contractor, Leon Wells, to smash all drums placed in the off-site containment area. Leon Wells was the contractor engaged by ACS during the period from approximately 1968 to 1975 to clear drums stored on-site and bury them in the off-site containment area, as well as other tasks. It was not the practice of ACS to bury drums containing nonreclaimable material in the off-site containment area prior to 1968. As documentation of this practice, ACS attaches copies of invoices from Leon Wells which reflect that he smashed drums before burying them in the pit (off-site containment area.)

Ms. Karen Martin
August 28, 1992
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Furthermore, the tanker buried in the off-site containment area was a single axle tank trailer of approximately 3,000-4,000 gallons capacity. It was not used for a period of time prior the burial because it leaked. Based on the usual practice of Leon Wells, it is ACS's belief that the trailer was also smashed during burial.

Yours very truly,


James Tarpo
President

JT/rl

Enclosure



LEON WELLS

1405

HAULING OF ALL KINDS
DOZER WORK - TOWING

PAID
7219

938 So. Arbogast - Griffith, Ind.

Phone: 838-2575

Rental - \$300.00
Judge - \$880.00
938 So. Arbogast - Griffith, Ind.
63000

DATE Feb. 28 1975

American Chemical

2 6 hrs crane pushing & smashing barrel at pit	150.00	5
2 7 hrs crane pushing & smashing barrel at pit	160.00	5
2 8 hrs crane pushing & smashing barrel at pit	150.00	5
2 8 hrs crane pushing & loading rock	150.00	5
2 8 hrs truck hauling rock	90.00	5
2 9 hrs 12 ft high lift loading & spreading rock	80.00	5
2 11 hrs crane loading & spreading rock	160.00	5
2 11 hrs truck hauling rock	30.00	5
2 12 hrs crane casting road on back wall of barrel pit	75.00	5
2 12 hrs 12 ft high lift loading rock	60.00	5
2 13 hrs truck hauling rock	45.00	5



LEON WELLS

1435

HAULING OF ALL KINDS
DOZER WORK - TOWING

938 So. Arbogast - Griffith, Ind.

Phone: 838-2575

DATE June 30 1975

American Chemical
Work for June 75

9 MC truck rental	150.00	8
Welder rental	150.00	8
6-30 2 hrs crane pushing & smashing barrel	50.00	8
	1015.00	

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CERTIFIED

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MAIL

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